SBC Telecommunications, Inc. 1401 I Street, N.W., Suite 1100 Washington, D.C. 20005 Phone 202 326-8845 Fax 202 408-4801



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AUG 28 2000

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

August 28, 2000

Ms. Magalie Roman Salas Secretary Federal Communications Commission 445 12th Street, NW Washington, DC 20554

Ex Parte Presentation

RE: In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability, CC Docket No. 98-147

Dear Ms. Salas:

On Friday August 25, 2000, Jay Bennett, Hope Thurrott, Matthew Adams, Randy Butler and the undersigned from SBC met with Margaret Egler, Assistant Deputy Chief, Policy and Program Planning Division and Bill Kehoe, Special Counsel, Policy and Program Planning Division to discuss unconditioned space provisioning intervals.

We discussed the Commission's recent Order on Reconsideration in the above referenced proceeding. We discussed the fact that it takes longer to provision unconditioned space than it does to provision conditioned space. SBC expressed its support for Sprint's initial recommendation (Petition for Partial Reconsideration and/or Clarification, June 1, 1999) that unconditioned space provisioning intervals be set at a maximum of 180 days. Specific examples of problems that ILECs encounter when working to provision unconditioned spaces were provided (see attached).

Sincerely,

Jared Craighead

Associate Director - Federal Regulatory

Cc:

Margaret Egler Bill Kehoe

Attachments

No. of Copies rec'd O+ 2
List A B C D E

Unconditioned Space Provisioning Intervals

- Unconditioned space is the exception
- Unconditioned space does not have the proper infrastructure to support collocation
 - Power and HVAC delivery and installation times
 - Forecasts are inherently inaccurate and they are not binding
- No winners in provisioning disputes
- States may be pressured to defer to national standards



Lucent Technologies
Sell Labs Innection
A T & T - E N G . - R O U T I N E

S UTHWESTERN

EQUIPMENT ORDER

(309)

TO 82148581496

PAGE 001
ISSUE 02
DATE ISSUED 06/21/99

r. 62/62

COMMITMENT-SCHEDULE 345 STATE LUCENT ORDER NO. F7733JK SYS. CD TOWN SERVICE CENTER OFFICE KANSAS C EANDER CUSTOMER NAME
S WEST B CUSTOMER AREA CUSTOMER DIVISION CUSTOMER ORDER NO NA66744-00 S A SA MAIN SHIP DATE / 07/03/99 AREA/CCLI ACCT 000 07/09/99 EST/AUTH 000000 DATE ORD, RCVD. 04/23/99 CUST, DATE OF ORD 04/23/99 07/10/99 INST. COMPL. DATE 10/31/99 COMPL REQ'D 10/31/99 TM 9 ORG. 1 KR3 3BC 1200 PLANNING NO. CORRES DATE 05/27/99 BLDG. READY INST. INTV. IN/T LUCENT TECHNOLOGIES

F7733JK NX66744-00 0000000

ATTN RICO FRESCH 512-416-4407

BEKINS/ELECTRONIC DATA CARRIER INC
11604 STONE HOLLOW

AUSTIN NOW INSTALLER PAPERS TO
LUCENT TECHNOLOGIES
F7733JK / NA66744-00
ATTN OPERATIONS MANAGER
2501B CENTRAL PARKWAY
SUITE B1
HOUSTON TX 776 SHIP TO TX 77092-7716 SEND SMIPMENTS UNDER 025
LUCENT TECHNOLOGIES
F7733JK NX66744-00 0000000
ATTN RICO FRESCH 512-416-4407
BEKINS/ELECTRONIC DATA CARRIER
11604 STONE HOLLOW RESP REG INST. ORG. E SOUTHWESTERN JA3B31J00 CUST. PRIORITY PREMIUM QUOTED DATA CARRIER INC INST AREA INST. DISTRICT SA AUSTIN 78758-3264 FNG FURN INST EQUIP NEW OR ADDL JAUTH. AUTH. AUTH ADDL COSIP ORDER TUAL E&M INTERVAL CONTRACT DUE DATE ACTUAL 06/21/99 CUSTOMER ORDER CONTACT
SWBT CO. F7733JK / NA66744-00
OFFICE LEANDER
ATTN MICKEY COVINGTON
1010 NORTH ST MARYS ROOM 327
CAN ANTONIO TX 78215-2109 210-351-4072 RECEIVED FIRM PRICE QUOTE NARRATIVE FIRM PRICE QUOTE ORDER 99-6295 JUN 2 9 7999 ORDER DESCRIPTION FNGR94BRARY-IMC 314 891-2965 314 891-2113 512-416-4407 210-351-4072 010 OFFICE NAME LEANDER ENGR. CUSTOMER SVC. FIELD SVC. INSTALLER TELCO ENG 011 0000000012345670 LINDA KENNER BONNIE HILKER RICO FRESCH MICKEY COVINGTON BASE 5T22 THIS ORDER PROVIDES FOR NEW LINEAGE POWER PLANT REPLACE 111A POWER PLANT WITH THIS ORDER ACCEPTED UNDER THE TERMS AND CONDITIONS OF THE FOLLOWING CONTRACTS CO099MO, CO099N2, CO09902. 091 REASON FOR ISSUE START DATE RESCHEDULED DUE TO LATE ENGINEERING SPECS 3)

LAST PAGE-

F7733JK

- 1. Customer Date of Order: This order was placed on 4/23/99
- 2. Actual Engineering and Material interval was 10 Weeks
- 3. Delayed Engineering Specs caused the job start date to be rescheduled.
- 4. This job replaced a 111A power plant with New Lineage Power Plant.
- 5. The Equipment estimated ship date was on 07/03/99. Two months later the equipment still had not shipped.
- 6. Installation estimated start date was 7/10/99.
- 7. The estimated complete date was 10/31/99.